

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

NEW MEXICO UNITED FOOD AND
COMMERCIAL WORKERS UNION'S AND
EMPLOYERS' HEALTH AND WELFARE TRUST
FUND, on behalf of itself and all others similarly
situated,

Plaintiff

v.

PURDUE PHARMA L.P., *et al.*,

Defendants.

07-CV-6916 (JGK)

Electronically Filed

**MOTION TO ADMIT COUNSEL
PRO HAC VICE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Matthew T. McLaughlin, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of:

M. King Hill, III
Venable LLP
PNC Bank Building
Two Hopkins Plaza
Suite 1800
Baltimore, MD 21201
Telephone: (410) 244-7400
Fax: (410) 244-7742

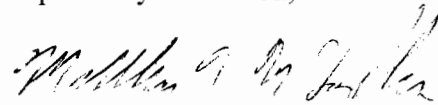
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U.S. DISTRICT COURT
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S.D. OF N.Y.

M. King Hill, III is a member in good standing of the Bars of the State of Maryland and the District of Columbia. There are no pending disciplinary proceedings against M. King Hill, III in any State or Federal Court.

Dated: November 9, 2007
New York, New York

Respectfully submitted,

By:

A handwritten signature in black ink, appearing to read "Matthew T. McLaughlin", is written over a horizontal line.

Matthew T. McLaughlin(MM-6241)
VENABLE LLP
The Chrysler Building
405 Lexington Avenue, 62nd Floor
New York, New York 10174
Telephone: (212) 307-5500
Fax: (212) 307-5598

*Attorneys for Defendants Abbott
Laboratories and Abbott Laboratories, Inc.*

CERTIFICATE OF SERVICE

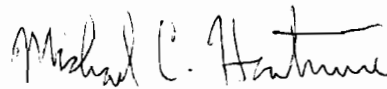
I, Michael C. Hartmere, hereby certify that on November 9, 2007, I caused a true and correct copy of the foregoing **Motion to Admit Counsel Pro Hac Vice**, to be served via United States mail, postage prepaid, on counsel of record to all parties in this case at the following addresses:

Christopher Adam Seeger, Esq.
Seeger Weiss LLP
One William Street, 10th Floor
New York, NY 10004
212-584-0700

Attorneys for Plaintiff New Mexico United Food and Commercial Workers Union's and Employers' Health and Welfare Trust Fund, on behalf of itself and all others similarly situated

Alexandra Katherine Nellos, Esq.
Mary Therese Yelenick, Esq.
Donald I. Strauber, Esq.
Phoebe Anne Wilkinson, Esq.
Chadbourn & Parke LLP (NY)
30 Rockefeller Plaza
New York, NY 10112
(212) 408-5100 x1189

Attorneys for Defendants Purdue Pharma L.P., The Purdue Frederick Company Inc., Purdue Pharma Inc., The P.F. Laboratories, Inc., Michael Friedman, Howard R. Udell and Paul D. Goldenheim

A handwritten signature in black ink, appearing to read "Michael C. Hartmere", written over a horizontal line.

Michael C. Hartmere

Dated: New York, New York
November 9, 2007

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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**AFFIDAVIT OF MATTHEW T.
McLAUGHLIN IN SUPPORT OF
MOTION TO ADMIT COUNSEL
PRO HAC VICE**

State of New York)
) ss:
County of New York)

Matthew T. McLaughlin, being duly sworn, hereby deposes and says as follows:

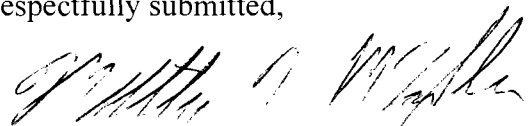
1. I am a partner in Venable LLP, counsel for Defendants Abbott Laboratories and Abbott Laboratories, Inc. ("Abbott") in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Abbott's motion to admit M. King Hill, III as counsel pro hac vice to represent Abbott in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 1995. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known M. King Hill, III since 2005.

4. M. King Hill, III is a partner in Venable LLP, in Baltimore, Maryland. His office is located at PNC Bank Building, Two Hopkins Plaza, Suite 1800, Baltimore, MD 21201.
5. Certificates of good standing for M. King Hill, III are attached hereto as **Exhibit A**.
6. I have found M. King Hill, III to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure as well as the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York.
7. Accordingly, I am pleased to move for the admission of M. King Hill, III, pro hac vice.
8. I respectfully submit a proposed order granting the admission of M. King Hill, III, pro hac vice, which is attached hereto as **Exhibit B**.

WHEREFORE it is respectfully requested that the motion to admit M. King Hill, III, pro hac vice, to represent Defendants Abbott Laboratories and Abbott Laboratories, Inc. in the above-captioned matter, be granted.

Dated: November 9, 2007
New York, New York

Respectfully submitted,

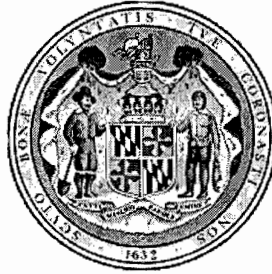

MATTHEW T. McLAUGHLIN (MM-6241)

*Sworn to before me this
9th day of November, 2007
Liam D. Evans*

Liam D. EVANS, JR.
County Clerk, State of New York
ID: C2EW614334
Commission Expires Aug. 3, 2008

EXHIBIT A

**Court of Appeals
of Maryland
Annapolis, MD**



CERTIFICATE OF GOOD STANDING

STATE OF MARYLAND, ss:

*I, Alexander L. Cummings, Clerk of the Court of Appeals of Maryland,
do hereby certify that on the tenth day of December, 1981,*

Milton King Hill, III

*having first taken and subscribed the oath prescribed by the Constitution and
Laws of this State, was admitted as an attorney of said Court, is now in good
standing, and as such is entitled to practice law in any of the Courts of said
State, subject to the Rules of Court.*

In Testimony Whereof, *I have hereunto
set my hand as Clerk, and affixed the Seal
of the Court of Appeals of Maryland, this
twelfth day of October, 2007.*

Alexander L. Cummings
Clerk of the Court of Appeals of Maryland



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D. C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia
Court of Appeals, do hereby certify that

MILTON K. HILL

was on the 3RD day of MAY, 1999
duly qualified and admitted as an attorney and counselor and
entitled to practice before this Court and is, on the date
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have
hereunto subscribed my name
and affixed the seal of this
Court at the City of
Washington, D.C., on
November 6, 2007.

GARLAND PINKSTON, JR., CLERK

By: 
Deputy Clerk

EXHIBIT B

**UNITED STATES DISTRICT COURT
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Defendants.

07-CV-6916 (JGK)

Electronically Filed

**ORDER FOR ADMISSION
PRO HAC VICE
ON WRITTEN MOTION**

Upon the motion of Matthew T. McLaughlin, attorney for Defendants Abbott Laboratories and Abbott Laboratories, Inc. and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that:

M. King Hill, III
Venable LLP
PNC Bank Building
Two Hopkins Plaza
Suite 1800
Baltimore, MD 21201
Telephone: (410) 244-7400
Fax: (410) 244-7742
E-mail: mkhill@venable.com

is admitted to practice pro hac vice as counsel for Defendants Abbott Laboratories and Abbott Laboratories, Inc. in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an

ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of the Court.

Dated: _____, 2007
New York, New York

U.S.D.J.